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-and-

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Lehman Brothers Holdings Inc.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:	: Chapter 11
	: Case No. 08-13555 (JMP)
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:
	:
Debtors.	:
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LEHMAN BROTHERS HOLDINGS INC., LEHMAN	:
BROTHERS SPECIAL FINANCING INC., LEHMAN	:
BROTHERS COMMODITY SERVICES INC., LEHMAN	:
BROTHERS COMMERCIAL CORP., and	:
OFFICIAL COMMITTEE OF UNSECURED	:
CREDITORS OF LEHMAN BROTHERS HOLDINGS	: Adversary Proceeding
INC.,	: No.: 12-01044 (JMP)
Plaintiffs and	:
Plaintiff Intervenor,	:
	:
-against-	:
	:
CITIBANK, N.A., CITIGROUP GLOBAL MARKETS LTD.,	: <b>STIPULATION AND</b>
	: <b>[PROPOSED] ORDER</b>
CITIGROUP FINANCIAL PRODUCTS INC., CITIGROUP	: <b>EXTENDING DEFENDANTS'</b>
ENERGY INC., CITI CANYON LTD., and CITI SWAPCO	: <b>AND DEFENDANT</b>
INC.,	: <b>INTERVENORS' TIME TO</b>
	: <b>ANSWER THE SECOND</b>
	: <b>AMENDED COMPLAINT</b>
Defendants.	:
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Plaintiffs Lehman Brothers Holdings Inc., Lehman Brothers Commercial Corp., Lehman Brothers Special Financing Inc., Lehman Brothers Commodity Services Inc., and the Official Committee of Unsecured Creditors of Lehman Brothers Holdings Inc. (“Plaintiffs”), having filed the Complaint and Claims Objection against Defendants Citibank, N.A. (“Citibank”), Citigroup Global Markets Ltd. (“CGML”), Citigroup Financial Products Inc. (“CFPI”), Citigroup Energy Inc. (“Citi Energy”), and Citi Canyon Ltd. (“Citi Canyon”) on February 8, 2012 (the “Complaint”); and Citibank, CGML, CFPI, Citi Energy, and Citi Canyon having timely answered the Complaint on May 8, 2012; and Plaintiffs having filed the First Amended Complaint and Claims Objection against Citibank, CGML, CFPI, Citi Energy, Citi Canyon, and Citi Swapco Inc. (“Swapco,” and together with Citibank, CGML, CFPI, Citi Energy, and Citi Canyon, “Defendants”) on November 16, 2012 (the “First Amended Complaint”); and Defendants having timely answered the First Amended Complaint on February 14, 2013; and FYI Ltd., FFI Fund Ltd., and Olifant Fund, Ltd. (together, “Defendant Intervenor”) having answered the First Amended Complaint on March 28, 2013; and Plaintiffs having filed a Second Amended Complaint and Claims Objection against Defendants and Defendant Intervenor on January 29, 2014 (the “Second Amended Complaint”); and Plaintiffs, Defendants, and Defendant Intervenor having stipulated to an extension of the time within which Defendants and Defendant Intervenor may answer or otherwise respond to the Second Amended Complaint, the Court hereby Orders Defendants and Defendant Intervenor to answer or otherwise respond to the Second Amended Complaint by February 28, 2014.

*[Remainder of Page Intentionally Left Blank]*

Dated: New York, New York  
January 30, 2014

CURTIS, MALLET-PREVOST, COLT  
& MOSLE LLP

By: /s/ Turner P. Smith  
Name: Turner P. Smith  
Title: Partner  
*Counsel for Lehman Brothers Holdings  
Inc., Lehman Brothers Special Financing  
Inc., Lehman Brothers Commodity  
Services Inc. and Lehman Brothers  
Commercial Corp.*

QUINN EMANUEL URQUHART  
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By: /s/ Andrew J. Rossman  
Name: Andrew J. Rossman  
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*Special Counsel for Official Committee  
of Unsecured Creditors of Lehman  
Brothers Holdings Inc., et al.*

PAUL, WEISS, RIFKIND, WHARTON  
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By: /s/ Claudia L. Hammerman  
Name: Claudia L. Hammerman  
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*Counsel for Citibank, N.A., Citigroup  
Global Markets Ltd., Citigroup  
Financial Products Inc., Citigroup  
Energy Inc., Citi Canyon Ltd., and Citi  
Swapco Inc.*

ROPES & GRAY LLP

By: /s/ James A. Wright  
Name: James A. Wright, III  
Title: Counsel  
*Counsel for FYI Ltd., FFI Fund Ltd., and  
Olifant Fund, Ltd.*

**SO ORDERED:**

Dated: New York, New York  
\_\_\_\_\_, 2014

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UNITED STATES BANKRUPTCY JUDGE